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Governor

JOHN A. SANCHEZ
Lt. Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

August 10, 2018

Steve Mueller, Acting City Manager
City of Aztec
201 West Chaco
Aztec, New Mexico 87410

Re: City of Aztec Wastewater Treatment Plant; MSGP; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES #NMR053305; July 11, 2018

Dear Mr. Mueller:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Robert Houston
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WS)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Robert Houston (Houston.Robert@epa.gov) is the USEPA Region 6's Stormwater Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN)
Darlene Whitten-Hill, USEPA (6EN) by e-mail
Robert Italiano, NMED District II by e-mail
Laurie Martinez, City of Aztec by e-mail

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NMR0533051			180711			~		S		

Remarks: SECTOR TREATMENT WORKS

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				3		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
City of Aztec WWTP – Location: From Bloomfield, take Hwy 550 North to Aztec to Hwy 516 ◊ go east to Oliver Street. Turn - South, go about ½ mile south of the intersection (signal light) of Oliver Street and NM HWY 516. The road goes directly to the WWTP. The main lab and office buildings are on the right.

Entry Time /Date
8:55AM 7-11-18

Permit Effective Date
6-4-2015

Exit Time/Date
11:45AM 7-11-18

Permit Expiration Date
6-4-2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Anthony Garcia/WW Ops Supervisor/ (505) 334-6448
Tyrone Begay /(505) 334-6448
Laurie Martinez/GIS Tech/ 505-334-7600

Other Facility Data

SIC: 4952
Latitude: 36°49'07"
Longitude: 108°01'24"

Name, Address of Responsible Official/Title/Phone and Fax Number
Mr. Steve Mueller/Interim City Manager /505-334-7602
City of Aztec 201 W. Chaco Aztec, NM 87401

Contacted
Yes [ ] No [X]

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Inspectors Jennifer Foote (NMED), David Esparza(EPA), and Magda Dallemagne (EPA) arrived on site and explained the purpose of the inspections and presented credentials to Mr.Garcia and then to Ms.Martinez when she arrived onsite. A CEI for the NPDES Individual Permit for the POTW was also conducted concurrently on this day by EPA staff. Ms. Martinez provided the SWPPP for review and accompanied us on a tour of the facility. An exit interview was conducted before the inspectors departed the facility.

2.See attached sheets for further details

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Jennifer Foote */s/ Jennifer Foote*	**NMED/SWQB 505-827-0596**	**8/9/18**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Sarah Holcomb, Program Manager */s/ Sarah Holcomb*	**NMED/SWQB 505-827-2798**	**8/10/18**

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information	
Inspection Type	Compliance Evaluation
NPDES ID Number	NMR053305
Inspection Date	7/11/18
Inspector Type *(circle one)*	☐EPA ☒State ☐EPA Oversight
Facility Sector/ SIC/Activity Code	Sector T Treatment Works/ SIC 4952

General	
Inspector Name	Jennifer Foote
Telephone	505-827-0596
Entry Time	8:55am
Exit Time	11:45am
Signature	*/s/ Jennifer Foote*

Facility Location Information				
Name/Location/ Mailing Address	Aztec WWTP 201 West Chaco Aztec, New Mexico 87410			
GPS Coordinates	Latitude	36.819186	Longitude	-108. 0231333
Receiving Water(s)	Animas River (San Juan River to Estes Arroyo) in Water Quality Segment 20.6.4.403 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mr. Steve Mueller/Interim City Manager	505-334-7602
Facility Contact	Laurie Martinez/GIS Tech Anthony Garcia/WW Operations Supervisor	505-334-7600 505-334-6448
Authorized Official(s)	Mr. Steve Mueller/Interim City Manager	505-334-7602

Basic Permit Information		
Permit Coverage	☒ Y	☐N
Permit Type	☒ General	☐ Individual
Operational Date		
NOI/Application Date	10/21/2015	
If applicable, is no exposure certification on file?	☐ Y	☐N ☒N/A

Basic SWPPP Information		
SWPPP Prepared & Available	☒ Y	☐N
SWPPP Contents Satisfactory	☒ Y	☐N
SWPPP Implementation Satisfactory	☒ Y	☐N
SWPPP Date	September 2015	

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	☒ Y	☐ N	SWPPP signed 9/10/15
Copy of the NOI and acknowledgment letter from EPA?	☒ Y	☐ N	
Copy of the permit language?	☒ Y	☐ N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	☒ Y	☐ N	
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3).	☐ Y	☐ N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	☐ Y	☐ N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	☒ Y	☐ N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	☒ Y	☐ N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	☐ Y	☐ N	N/A
Did all “operators” sign/certify the SWPPP?	☒ Y	☐ N	
Is the storm water pollution prevention team identified (name or title)?	☒ Y	☐ N	Qualifications of SWPP Preparer are not included as per Part 5.1 of the Permit. Team should include persons responsible for implementing and maintaining controls measures.
Are the storm water pollution prevention team’s responsibilities identified?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	☒ Y	☐ N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	☒ Y	☐ N	
Is there a site specific site map?	☒ Y	☐ N	
Does the site map contain the size of the property in acres?	☒ Y	☐ N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	☐ Y	☒ N	
Does the site map contain directions of storm water flow (indicated by arrows)?	☒ Y	☐ N	Also indicates which drainage structures flow to headworks.
Does the site map contain locations of all existing structural control measures?	☒ Y	☐ N	New berm to south of #12 not shown.
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	☐ Y	☒ N	Animas River is impaired and has a TMDL for nutrients, temperature, and E. coli. (https://www.env.nm.gov/swqb/documents/swqbdocs/MAS/TMDLs/Animas/2013/AnimasTMDL.pdf https://www.env.nm.gov/swqb/Projects/SanJuan/TMDL2/SJR_Pt2TMDLs.pdf
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	☒ Y	☐ N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	☒ Y	☐ N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	☐ Y	☐ N	N/A.
Does the site map contain locations of all storm water monitoring points?	☐ Y	☒ N	Stormwater is monitored near point #7
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	☐ Y	☒ N	Storm water is also leaving the site in the corner near #3 on the site map(photo 1) and as sheet flow along fence to the south of #10. A new drainpipe (possibly roof drains from new belt press building#8) is not on sitemap- source of pipe must be determined(photo 5).
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	☐ Y	☐ N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation? • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery	☐ Y	☒ N	Diesel generator not shown on map(photo 2)
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	☐ Y	☒ N	There are run-on issues with sediment and erosion.
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	☐ Y	☐ N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	☒ Y	☐ N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	☒ Y	☐ N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	☐ Y	☐ N	N/A. SWPPP reports no significant spills or leaks have occurred.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination.	☐ Y	☒ N	
Does salt storage occur at this facility?	☒ Y	☐ N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	☐ Y	☒ N	States there was no data collected in past permit periods.

Controls to Reduce Pollutants			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	☒ Y	☐ N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	☒ Y	☐ N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	☒ Y	☐ N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	☒ Y	☐ N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	☒ Y	☐ N	.
Does the SWPPP include a schedule for preventative maintenance procedures?	☒ Y	☐ N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	☒ Y	☐ N	
Does the facility implement procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	☒ Y	☐ N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	☒ Y	☐ N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	☒ Y	☐ N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	☐ Y	☒ N	No documentation of training of onsite personnel.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	☒ Y	☐ N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	☒ Y	☐ N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	☒ Y	☐ N	
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	☒ Y	☐ N	Located within concrete curbed area.
Employee Training – is there a schedule for regular (at least annually) employee training?	☐ Y	☒ N	Records for training for Laurie Martinez on April 2016, Jan 2013, May 2005 Permit section 2.1.2.8 "You must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of your stormwater pollution prevention team."
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	☒ Y	☐ N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	☒ Y	☐ N	.
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	☒ Y	☐ N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
General			**Notes:**
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	☒ Y	☐ N	
Are inspections documented, including: • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed.	☒ Y	☐ N	Delegation of authority letter from Joshua Ray City Manager for Laurie Martinez to certify inspections is in plan. Qualifications of inspector were not included in plan, only a job title. A list of training was included in the annual training documentation section.
Exceptions, including (see 4.1.3): • Inactive and unstaffed sites	☐ Y	☐ N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	☒ Y	☐ N	Facility is collecting sample at the pond, but not all discharge points.
Does the assessment consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container.	☒ Y	☐ N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Are assessments documented, including: • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes.	☒ Y	☐ N	Inspection reports often include a photo of the sample.
Exceptions, including (see 3.2.3): • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls • Inactive and unstaffed sites.	☒ Y	☐ N	Documented quarters when no discharge occurred. Additional information on why sample is collected at pond and not at all stormwater discharge points needs to be included in plan (see part 5.2.5.3).
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	☐ Y	☐ N	N/A- Per 2015 permit part of routine facility inspection
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	☐ Y	☐ N	N/A
Cover all areas of the facility?	☐ Y	☐ N	N/A
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
Include observations of the following: • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed.	☐ Y	☐ N	N/A
Are inspections documented, including: • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	☐ Y	☐ N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	☐ Y	☐ N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	☐ Y	☐ N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	☐ Y	☐ N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling.	☐ Y	☐ N	N/A for Sector T
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	☐ Y	☐ N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	☐ Y	☐ N	N/A
Exceptions, including (see 6.1 & 6.2): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	☐ Y	☐ N	N/A
Effluent Limitations Monitoring			
Sampled once per year?	☐ Y	☐ N	N/A
Follow-up requirements if discharge exceeds effluent limit (see 6.3)?	☐ Y	☐ N	N/A
Other Required Monitoring			
• State or Tribal provisions • Discharges to impaired waters • Additional monitoring required by EPA.	☐ Y	☐ N	N/A
Reporting (Part 7)			
General			**Notes:**
Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?	☐ Y	☐ N	N/A
Is the annual report submitted by 45 days after conducting the comprehensive site inspection?	☒ Y	☐ N	Annual report submitted 2/21/18
If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?	☐ Y	☐ N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	*(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system*) In general work is performed indoors as much as possible. Secondary containment is used for storage. Some items including possible asbestos pipe are stored in an area with stormwater flows (#14 on map, photo #1).
Good Housekeeping	*(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)* In general areas are kept neat and orderly.
Preventative maintenance	*(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)* Facility is inspected regularly for maintenance needs.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	*(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)* Some evidence of leaking or overfill from diesel generator(photo#2). Drum of open fluids located in contained area (photo#3)
Erosion and Sediment Controls	*(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)* Sediment pond is located at main discharge point (photo #4) Some erosion on site from runon from adjacent facilities, the facility has been working to try and get this long running problem resolved (photo #6-7).
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* Many of the process and storage areas drain to the headworks. One storm drain leaves the site and a cobble channel/pond has been built. A new berm was built south of #12 on the map to divert runoff from the slope where erosion had occurred in the past (photo #8).
Salt Storage Piles	*(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)* Sand is stored within containment areas.

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* A few pieces of waste metal were noted on the ground near the culvert storage on the SW side and in the drainage near #14 on the map, but in general waste materials seemed to be disposed of properly.
Evidence of non-storm water discharges	No unpermitted non-stormwater discharges were observed on the day of the inspection. However, a new pipe was noted from the new belt press building and the source of the pipe needs to be confirmed(photo#5).
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* Facility is swept as needed to minimize dust and tracking.

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: materials stored in drainage pathway (number 14 on map)		

NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: Diesel generator with staining located to the south of control building		

NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: open drum of fluids located within secondary containment		

NMED/SWQB Official Photograph Log Photo # 4		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: looking towards retention pond area		

NMED/SWQB Official Photograph Log Photo #5		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: pipe discharging to the west of new belt press building		

NMED/SWQB Official Photograph Log Photo #6		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: Run on from adjacent Maintenance yard		

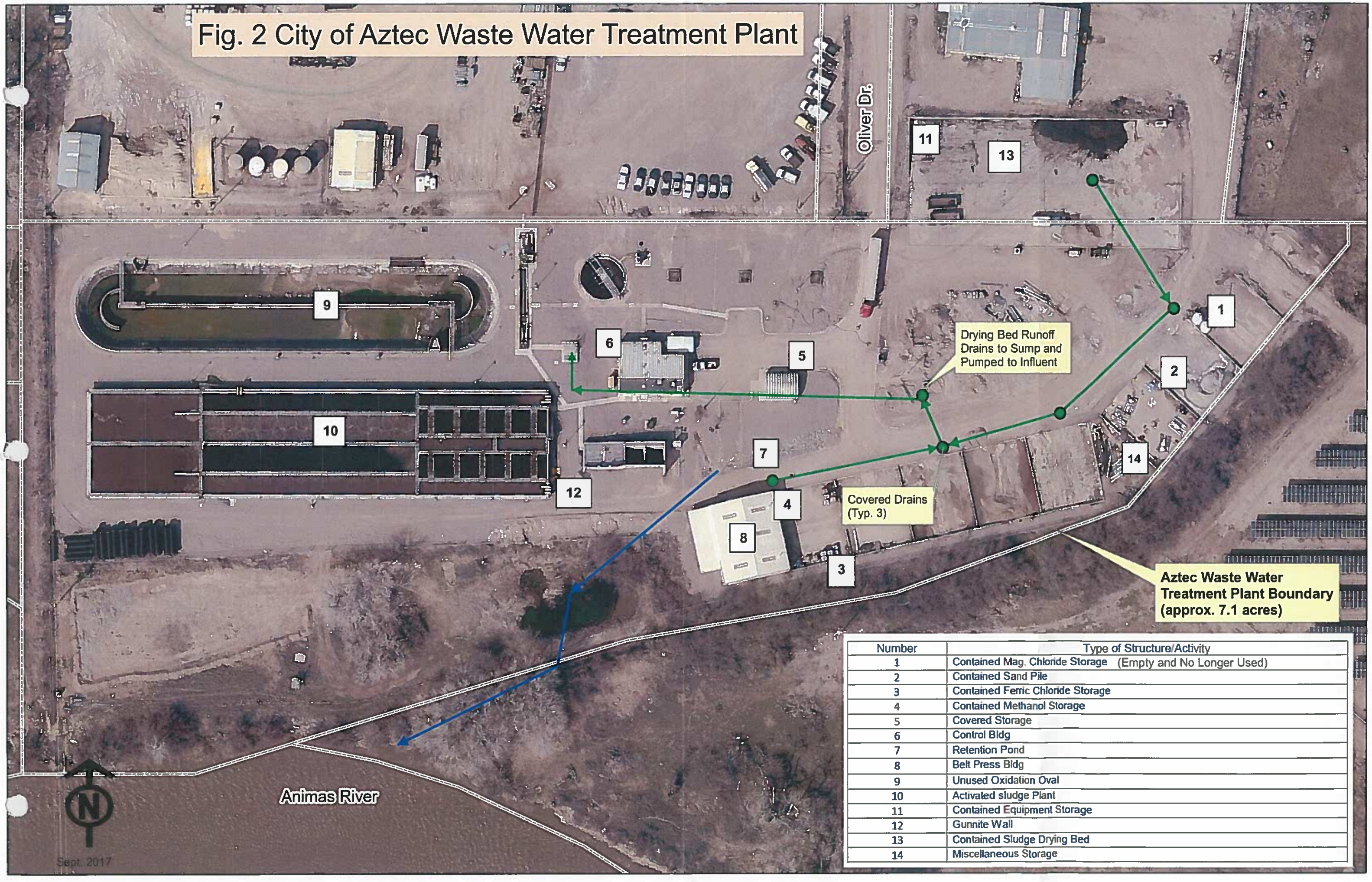
NMED/SWQB Official Photograph Log Photo # 7		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: Run on and sediment deposition from adjacent County Property		

NMED/SWQB Official Photograph Log Photo # 8		
Photographer: Jennifer Foote	Date: 7/11/18	Time: approx. 10 am
City/County: Aztec/San Juan		State: New Mexico
Location: Aztec WWTP		
Subject: Erosion at fence south of point 12 on map		

.

Attachment 1
Site Map

Fig. 2 City of Aztec Waste Water Treatment Plant



Number	Type of Structure/Activity
1	Contained Mag. Chloride Storage (Empty and No Longer Used)
2	Contained Sand Pile
3	Contained Ferric Chloride Storage
4	Contained Methanol Storage
5	Covered Storage
6	Control Bldg
7	Retention Pond
8	Belt Press Bldg
9	Unused Oxidation Oval
10	Activated sludge Plant
11	Contained Equipment Storage
12	Gunnite Wall
13	Contained Sludge Drying Bed
14	Miscellaneous Storage

Attachment 2

Permittee Response

A desirable place to live, work and play; rich in history and small town values

September 6, 2018

Robert Houston
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WS)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

RE: City of Aztec WWTP; MSGP; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES #NMR053305; July 11, 2018

Dear All:

Here is a report on the compliance issues we have addressed at our Waste Water Facility for the City of Aztec.

1. Storm Water Team identified: Laurie Martinez, Prepare SWPPP, file NOI & NOT, Inspections, Annual Report and Staff Training; Public Works Crew, maintain and Implement control measures; Waste Water Treatment Plant Staff, maintain and implement control measures and good housekeeping. See enclosed Stormwater Team Identification sheet and certificate of training for Stormwater Management and Erosion control. Attachment A

2. Site map has been updated to include new berm to south of #12. Animas River now labeled as showing impairment. Stormwater monitoring site (#7). New drain pipe location (#17). Diesel Generator Locations (#15). Run-on issues at north property line. Attachment B

3. Large spill response is covered by the San Juan County Emergency Response Team. Small spill response is covered in the COA Stormwater Standard Operating Procedures used for training employees in good housekeeping measures. Training is to begin on Monday 9/10/2018.

4. Good Housekeeping training will begin on Sept. 10, 2018. It will cover all areas of spill response, general good housekeeping, vehicle maintenance, etc. Records of sign in

5. Asbestos pipe removal and removal of drum of fluids (polymers) is being quoted and will be done as per State of New Mexico purchasing due to cost. The SDS sheet for the polymer is enclosed. We have received one quote and are in the process of getting two more quotes. All other materials have been removed and disposed of at the metal recycling plant in Kirtland, NM. Attachment C & Picture #1

6. The diesel generators will be contained with a drip pan of some kind and spill kits will be located within range.

7. There is a run-on problem with the San Juan County property on the North property line. We have hired an engineer to do a drainage study and will work cooperatively with San Juan County to implement drainage controls using berms and ponds.

8. The berm located south of #12 will be lengthened and fortified when material and crews become available.

9. A small berm has been built to keep any discharge from leaving the site at location #14. Picture #2

10. Debris has been removed. Picture #3

11. Fuel container has been removed. Picture #4

If there are any further concerns or questions please feel free to contact myself or Laurie Martinez at 505-334-7663.

Sincerely,

Steve Mueller
City Manager
City of Aztec
201 W Chaco
Aztec, NM 87410

Cc: Jennifer Foote
Industrial and Stormwater Team Supervisor
Harold Runnels Bldg
1190 St Francis Dr
PO Box 5469
Santa Fe, NM 87502

Attachment

A

1.3 Stormwater Pollution Prevention Team

STAFF NAMES	Individual Responsibilities
Laurie Martinez	Prepare SWPPP, file NOI, NOT, Inspections, Annual Reports, Staff Training
Public Works Crew	Maintain and Implement control measures
Waste Water Plant Staff	Maintain and Implement control measures, Good Housekeeping

ALTITUDE TRAINING ASSOCIATES

Awards this Certificate of Completion to

Laurie Martinez

Who on April 22nd, 2016 Successfully Completed the Following Training Class:

Stormwater Management and Erosion Control During Construction - NPDES

Tom Lee

Instructor
Altitude Training Associates

ALTITUDE TRAINING ATA ASSOCIATES

Completion of This Course Has also Earned the Recipient .8 CEU's

4.5 *Employee Training.*

Training for employees will be conducted annually and will cover topics on good housekeeping, spill prevention and response, maintenance and material requirements. Employees will be trained in locations of controls on site and maintenance.

Training Date: 9-10-2018	
Training Description: Stormwater Pollution Prevention S.O.P. for Municipal Operations	
Trainer: LAURIE MARTINEZ	
Employees Trained	Employee Signature
Andrew Galloway	NM00939
Lorenzo A. Garcia	NM05123
William Mazzeo	NM19048

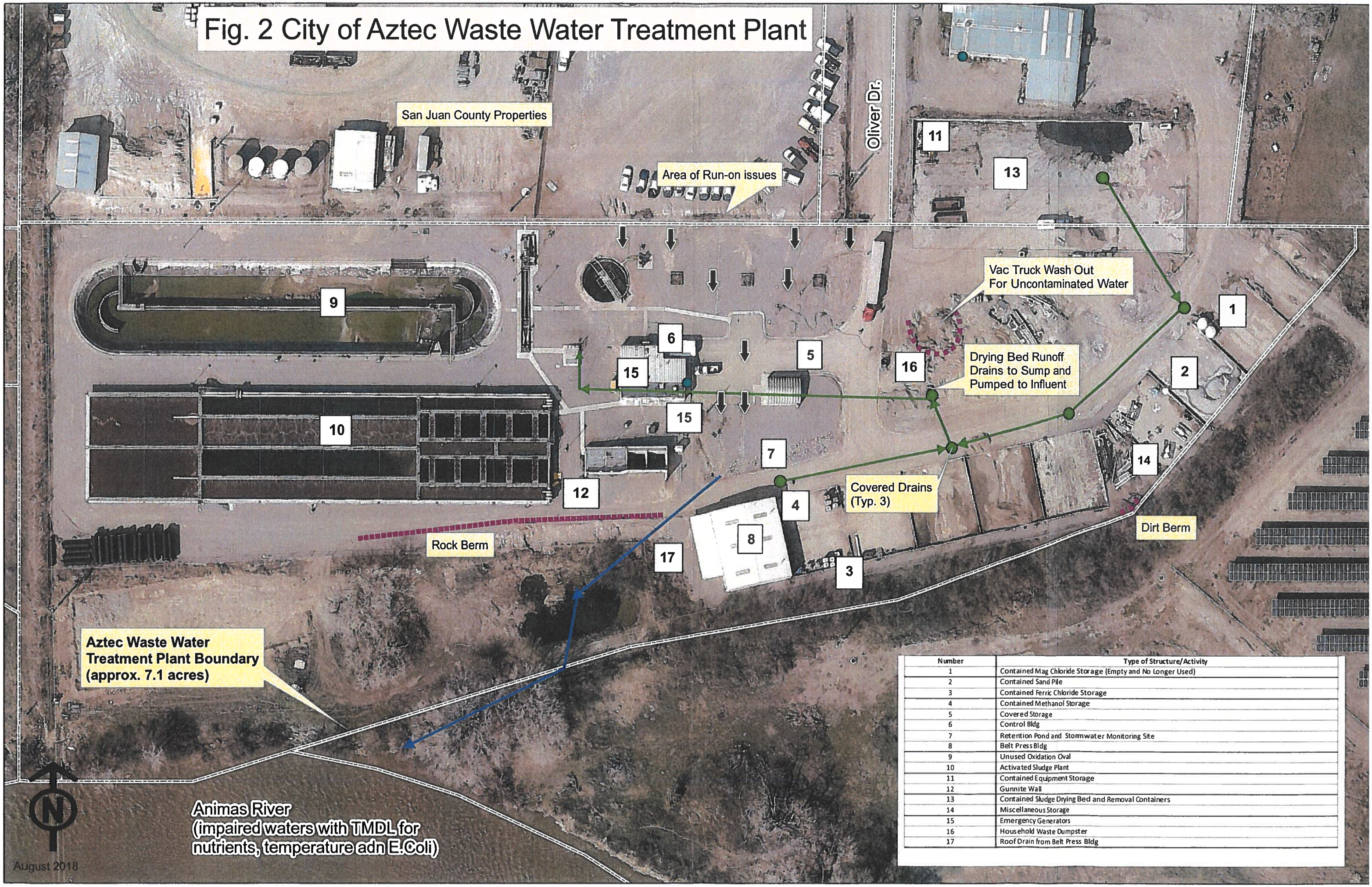
Training Date:	
Training Description: Stormwater Pollution Prevention S.O.P. for Municipal Operations	
Trainer: LAURIE MARTINEZ	
Employees Trained	Employee Signature

Training Date:	
Training Description:	
Trainer:	
Employees Trained	Employee Signature

Attachment

B

Fig. 2 City of Aztec Waste Water Treatment Plant



Number	Type of Structure/Activity
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6	Control Bldg
7	Retention Pond and Stormwater Monitoring Site
8	Belt Press Bldg
9	Unused Oxidation Oval
10	Activated Sludge Plant
11	Contained Equipment Storage
12	Gunnite Wall
13	Contained Sludge Drying Bed and Removal Containers
14	Miscellaneous Storage
15	Emergency Generators
16	Household Waste Dumpster
17	Roof Drain from Belt Press Bldg

Attachment

C

Item #4

SNF POLYDYNE

SAFETY DATA SHEET

According to U.S. Code of Federal Regulations 29 CFR 1910.1200, Hazard Communication.

SECTION 1: Identification of the substance/mixture and of the company/undertaking

1.1. Product identifier

Product name: **CLARIFLOC™ C-6266**

Type of product: Mixture.

1.2. Relevant identified uses of the substance or mixture and uses advised against

Identified uses: Processing aid for industrial applications.

Uses advised against: None.

1.3. Details of the supplier of the safety data sheet

Company: Polydyne Inc.
1 Chemical Plant Road
PO BOX 279, Riceboro, GA 31323
United States

Telephone: 1-800-848-7659

Telefax: (912)-884-8770

E-mail address: -

1.4. Emergency telephone number

24-hour emergency number: 1-800-424-9300

SECTION 2: Hazards identification

2.1. Classification of the substance or mixture

Classification according to paragraph (d) of 29 CFR 1910.1200:

Not classified.

2.2. Label elements

Labelling according to paragraph (f) of 29 CFR 1910.1200:

Inhalation:
Move to fresh air. No hazards which require special first aid measures.

Skin contact:
Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. In case of persistent skin irritation, consult a physician.

Eye contact:
Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Get medical attention immediately.

Ingestion:
Rinse mouth with water. Do NOT induce vomiting. Call a physician or poison control centre immediately.

4.2. Most important symptoms and effects, both acute and delayed

None under normal use.

4.3. Indication of any immediate medical attention and special treatment needed.

None reasonably foreseeable.

Other information:
None.

SECTION 5: Fire-fighting measures

5.1. Extinguishing media

Suitable extinguishing media:
Water. Water spray. Foam. Carbon dioxide (CO2). Dry powder.
Warning! Spills produce extremely slippery surfaces.

Unsuitable extinguishing media:
None.

5.2. Special hazards arising from the substance or mixture

Hazardous decomposition products:
Ammonia. Carbon oxides (COx). Nitrogen oxides (NOx). Hydrogen chloride. Hydrogen cyanide (hydrocyanic acid) may be produced in the event of combustion in an oxygen deficient atmosphere.

5.3. Advice for fire-fighters

Protective measures:
Wear self-contained breathing apparatus and protective suit.

Other information:
Spills produce extremely slippery surfaces.

SECTION 6: Accidental release measures

6 1. Personal precautions, protective equipment and emergency procedures

Distillates (petroleum), hydrotreated light
ACGIH: 200 mg/m³ (8 hours)

8.2. Exposure controls

Appropriate engineering controls:

Ensure adequate ventilation, especially in confined areas. Use local exhaust if misting occurs. Natural ventilation is adequate in absence of mists.

Individual protection measures, such as personal protective equipment:

a) Eye/face protection:
Safety glasses with side-shields.

b) Skin protection:
i) Hand protection: PVC or other plastic material gloves.
ii) Other: Wear coveralls and/or chemical apron and rubber footwear where physical contact can occur.

c) Respiratory protection:
No personal respiratory protective equipment normally required.

d) Additional advice:
Wash hands before breaks and immediately after handling the product. Wash hands before breaks and at the end of workday. Handle in accordance with good industrial hygiene and safety practice.

Environmental exposure controls:

Do not allow uncontrolled discharge of product into the environment.

SECTION 9: Physical and chemical properties

9.1. Information on basic physical and chemical properties

a) Appearance:	Viscous liquid, Milky.
b) Odour:	Aliphatic.
c) Odour Threshold:	No data available.
d) pH:	3.5 - 6.5 @ 5 g/L
e) Melting point/freezing point:	< 5°C
f) Initial boiling point and boiling range:	> 100°C
g) Flash point:	Does not flash.
h) Evaporation rate:	No data available.
i) Flammability (solid, gas):	Not applicable.

SECTION 11: Toxicological information

11.1. Information on toxicological effects

Information on the product as supplied:

Acute oral toxicity:	LD50/oral/rat > 5000 mg/kg
Acute dermal toxicity:	LD50/dermal/rat > 5000 mg/kg.
Acute inhalation toxicity:	The product is not expected to be toxic by inhalation.
Skin corrosion/irritation:	Non-irritating to skin.
Serious eye damage/eye irritation:	Not irritating. (OECD 437)
Respiratory/skin sensitisation:	Not sensitizing.
Mutagenicity:	Not mutagenic.
Carcinogenicity:	Not carcinogenic.
Reproductive toxicity:	Not toxic for reproduction.
STOT - Single exposure:	No known effects.
STOT - Repeated exposure:	No known effect.
Aspiration hazard:	Due to the viscosity, this product does not present an aspiration hazard.

Relevant information on the hazardous components:

Distillates (petroleum), hydrotreated light

Acute oral toxicity:	LD50/oral/rat > 5000 mg/kg (OECD 401)
Acute dermal toxicity:	LD50/dermal/rabbit > 5000 mg/kg. (OECD 402)
Acute inhalation toxicity:	LC0/inhalation/4 hours/rat >= 4951 mg/m³ (OECD 403) (Based on results obtained from tests on analogous products)
Skin corrosion/irritation:	Not irritating. (OECD 404) Repeated exposure may cause skin dryness or cracking.
Serious eye damage/eye irritation:	Not irritating. (OECD 405)
Respiratory/skin sensitisation:	By analogy with similar products, this product is not expected to be sensitizing. (OECD 406)
Mutagenicity:	Not mutagenic. (OECD 471, 473, 474, 476, 478, 479)
Carcinogenicity:	Carcinogenicity study in rats (OECD 451): Negative.
Reproductive toxicity:	By analogy with similar substances, this substance is not expected to be toxic for reproduction. NOAEL/rat = 300 ppm. (OECD 421)

Chronic toxicity to invertebrates:	No data available.
Toxicity to microorganisms:	No data available.
Effects on terrestrial organisms:	No data available.
Sediment toxicity:	No data available.

Relevant information on the hazardous components:

Distillates (petroleum), hydrotreated light

Acute toxicity to fish:	LC0/Oncorhynchus mykiss/96 hours > 1000 mg/L. (OECD 203)
Acute toxicity to invertebrates:	EC0/Daphnia magna/48 hours > 1000 mg/L. (OECD 202)
Acute toxicity to algae:	IC0/Pseudokirchneriella subcapitata/72 hours > 1000 mg/L. (OECD 201)
Chronic toxicity to fish:	NOEC/Oncorhynchus mykiss/28 days > 1000 mg/L
Chronic toxicity to invertebrates:	NOEC/Daphnia magna/21 days > 1000 mg/L
Toxicity to microorganisms:	EC50/Tetrahymena pyriformis/ 48h > 1000 mg/L.
Effects on terrestrial organisms:	No data available.
Sediment toxicity:	No data available. Readily biodegradable, exposure to sediment is unlikely.

Poly(oxy-1,2-ethanediyl), a-tridecyl-w-hydroxy-, branched

Acute toxicity to fish:	LC50/Cyprinus carpio/96 hours = 1 - 10 mg/L (OECD 203)
Acute toxicity to invertebrates:	EC50/Daphnia/48 hours = 1 - 10 mg/L (OECD 202)
Acute toxicity to algae:	IC50/Desmodesmus subspicatus/72 hours = 1 - 10 mg/L (OECD 201)
Chronic toxicity to fish:	No data available.
Chronic toxicity to invertebrates:	No data available.
Toxicity to microorganisms:	EC10/activated sludge/17 hours > 10000 mg/L (DIN 38412-8)
Effects on terrestrial organisms:	No data available.
Sediment toxicity:	No data available.

12.2. Persistence and degradability

Information on the product as supplied:

12.4. Mobility in soil

Information on the product as supplied:

No data available.

Relevant information on the hazardous components:

Distillates (petroleum), hydrotreated light

Koc: No data available.

Poly(oxy-1,2-ethanediyl), a-tridecyl-w-hydroxy-, branched

Koc: > 5000

12.5. Other adverse effects

None.

SECTION 13: Disposal considerations

13.1. Waste treatment methods

Waste from residues/unused products:

Dispose in accordance with local and national regulations.

Contaminated packaging:

Rinse empty containers with water and use the rinse-water to prepare the working solution. If recycling is not practicable, dispose of in compliance with local regulations. Can be landfilled or incinerated, when in compliance with local regulations.

Recycling:

Store containers and offer for recycling of material when in accordance with the local regulations.

SECTION 14: Transport information

Land transport (DOT)

Not classified.

Sea transport (IMDG)

Not classified.

Air transport (IATA)

Not classified.

SECTION 16: Other information

NFPA and HMIS Ratings:

NFPA:

Health:	0
Flammability:	1
Instability:	0

HMIS:

Health:	0
Flammability:	1
Physical Hazard:	0
PPE Code:	B

This data sheet contains changes from the previous version in section(s):

SECTION 8. Exposure controls/personal protection, SECTION 15. Regulatory information, SECTION 16. Other Information.

Key or legend to abbreviations and acronyms used in the safety data sheet:

Acronyms
STOT = Specific target organ toxicity

Abbreviations
Acute Tox. 4 = Acute toxicity Category Code 4
Asp. Tox. 1 = Aspiration hazard Category Code 1
Eye Dam 1 = Serious eye damage/eye irritation Category Code 1

Hazard statements
H302 - Harmful if swallowed
H304 - May be fatal if swallowed and enters airways
H318 - Causes serious eye damage

Training advice:

Do not handle until all safety precautions have been read and understood.

This SDS was prepared in accordance with the following:

U.S. Code of Federal Regulations 29 CFR 1910.1200

Version: 17.01.a

ENCC046

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage,

Picture

1

Picture

2

Picture

3

Picture

4